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March 11A, 2003

EX PARTE

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

**Re: Application by Qwest Communications International Inc. for
Authority to Provide In-Region InterLATA Services in New
Mexico, Oregon and South Dakota; WC Docket No. 03-11**

Dear Ms. Dortch:

Qwest Communications International Inc. (“Qwest”) submits this filing at the request of Commission staff to respond to four claims made by WorldCom regarding Qwest’s accuracy in updating Customer Service Records (“CSRs”).¹

WorldCom alleges that it examined 82 CSRs and found that Qwest failed to accurately update them in various ways. But, as explained more fully below, Qwest’s systems did in fact work as intended with respect to these CSRs.

The first allegation made by WorldCom is that 17 of the 82 CSRs WorldCom audited contained blocking options or features that WorldCom did not order. This same issue was raised by WorldCom in one of its daily meetings with Qwest (on February 21, 2003) on WorldCom’s system-related questions. Qwest’s investigation of the examples provided by WorldCom indicates that these CSRs were updated accurately. Existing blocking options on an end user’s CSR must be removed if the CLEC no longer wants them there or wishes to replace those blocking options with others. Because WorldCom did not remove the existing blocking features when adding others, the existing blocking features remained on the account. In order to clarify the process CLECs should use to replace blocking options, Qwest intends to update its PCAT to better explain how CLECs can order or remove multiple blocking options by utilizing the Remarks field and setting the order to manual handling. Qwest plans to distribute this update to the CLEC community for review on March 19, 2003.

¹ See Reply Comments of WorldCom, Inc., WC Docket No. 03-11, February 27, 2003, (“WorldCom Reply Comments”) at 14-15; *see also* Reply Declaration of Sherry Lichtenberg, WC Docket No. 03-11, February 27, 2003, (“Lichtenberg Reply Declaration”) ¶¶ 42-45.

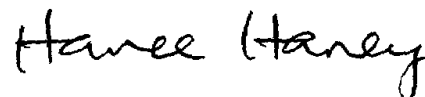
WorldCom's second allegation is that Qwest did not update the billing address on most CSRs to reflect the fact that WorldCom, not its end users, should receive the bill. While there may be variation among Qwest's regions as to how the billing information is populated on the CSR, this variation does not affect where bills are sent. This is because the summary bill, not the individual end-user account, identifies where the summary bill and all the associated sub-accounts will be sent. Therefore, the fact that certain WorldCom CSRs contain end user, not WorldCom, address information is irrelevant and does not lead to duplicate bills.

WorldCom's third allegation is that Qwest did not update the line status on 48 of the 82 CSRs that WorldCom audited. Qwest has investigated WorldCom's concern and has found that line status was appropriately provided for CSRs in the Central and Western regions. In Qwest's Eastern region, account status is not currently provided on UNE-P accounts. Thus, there was no line status to update for CSRs in that region. Qwest is in the process of investigating a system modification to provide CLECs with this information in the Eastern region and plans to inform the CLEC community when it is able to provide this information.

WorldCom's fourth and final allegation is that Qwest did not include the service establishment date on 65 of the 82 CSRs it audited. Service establishment dates are available only when an account is active. Once an account reaches a final status – meaning the end user has been issued a final bill – the service establishment date no longer appears on the CSR. When WorldCom raised this allegation with Qwest several weeks ago, Qwest investigated the CSRs identified by WorldCom and found that all active CSRs had service establishment dates, either at the account level or at the telephone number level. The only examples of CSRs without service establishment dates were for post-conversion retail accounts that had reached final status.

The twenty-page limit does not apply to this filing. Please contact the undersigned if you have any questions concerning this submission.

Respectfully submitted,

A handwritten signature in black ink that reads "Hamee Haney". The signature is written in a cursive, flowing style.

cc: K. Cook
W. Dever
G. Remondino
J. Myles
K. Brown
R. Harsch
H. Best

Marlene H. Dortch
March 11, 2003
Page 3

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K. Cremer
A. Medeiros
R. Weist